

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re:  Bernice Louellen Shippen,  Debtor,  Towd Point Mortgage Trust 2022-3, U.S. Bank Trust Company, National Association as Indenture Trustee,  Movant,  v. Bernice Louellen Shippen,  Debtor,  Scott F. Waterman, Trustee/Respondent.	Bankruptcy No. 25-10238-amc  Chapter 13  Related to Doc. No. 3
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**TOWD POINT MORTGAGE’S OBJECTION TO CONFIRMATION OF  
DEBTOR’S CHAPTER 13 PLAN**

Towd Point Mortgage Trust 2022-3, U.S. Bank Trust Company, National Association as Indenture Trustee, (“TOWD POINT MORTGAGE”), by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtor, Bernice Louellen Shippen, and in support thereof alleges as follows:

1. Debtor, Bernice Louellen Shippen, filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on January 20, 2025.
2. TOWD POINT MORTGAGE holds a security interest in the Debtor’s real property located 108 W Spring Ave Apt 9, Ardmore, PA 19003 (the “Property”), by virtue of a Mortgage

recorded with the Montgomery County Recorder of Deeds on March 30, 2007 in Instrument No. 2007039624 which has ultimately been assigned to Towd Point Mortgage Trust 2022-3, U.S. Bank Trust Company, National Association as Indenture Trustee.

3. Said Mortgage secures a Note in the amount of \$182,000.00
4. Upon review of internal records, it is anticipated that TOWD POINT MORTGAGE Proof of Claim will include a pre-petition arrearage of approximately \$17,603.85 a true and correct copy of the pre-petition arrearage is attached hereto as Exhibit "A."
5. On January 20, 2025, Debtor filed a Chapter 13 Plan (the "Plan") A true and correct copy of the Plan is attached hereto as Exhibit "B."
6. The Plan fails to account for the full pre-petition arrearage of \$17,603.85 as it only provides a total \$6,262.92 that will be paid to Secured Creditor through the Plan. See Exhibit "B."
7. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee's Office.
8. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) TOWD POINT MORTGAGE hereby objects to Debtor's proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

**WHEREFORE**, Secured creditor Towd Point Mortgage Trust 2022-3, U.S. Bank Trust Company, National Association as Indenture Trustee, respectfully requests that this Court not confirm the Chapter 13 Plan of Debtor, Bernice Louellen Shippen.

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**

Authorized Agent for Secured Creditor  
13010 Morris Rd., Suite 450  
Alpharetta, GA 30004  
Phone: (470) 321-7112  
Fax: (404) 393-1425

By: /s/Robert Shearer  
Robert Shearer, Esquire  
Pennsylvania Bar Number 83745  
Email: rshearer@raslg.com

Date: February 6, 2025

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In re:  Bernice Louellen Shippen,  Debtor,  Towd Point Mortgage Trust 2022-3, U.S. Bank Trust Company, National Association as Indenture Trustee,  Movant,  v. Bernice Louellen Shippen,  Debtor,  Scott F. Waterman, Trustee/Respondent.	Bankruptcy No. 25-10238-amc  Chapter 13  Related to Doc. No. 3
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on February 6, 2025, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Michael A. Cibik  
Cibik Law, P.C.  
1500 Walnut Street  
Suite 900  
Philadelphia, PA 19102

Scott F. Waterman [Chapter 13]  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street  
Suite 320  
Philadelphia, PA 19107

Bernice Louellen Shippen  
108 W Spring Ave Apt 9  
Ardmore, PA 19003-1232

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**

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